



**48 Wall Street, Suite 11, Manhattan, NY 10005**

March 31, 2020

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Colon v. The City of New York, et al. No. 16-CV-4540**  
**Williams v. The City of New York, et al. No. 16-CV-8193**

Dear Judge Broderick:

The Florestal Law Firm, PLLC is counsel to Sibyl Colon and Allison Williams (hereinafter, the "Plaintiffs"), in the above referenced matter. I beg this Court's pardon for this additional request for an extension of time. On March 17, 2020, your Honor so Ordered my initial request for an extension granting the following:

Oppositions originally due: 3/20/2020

Oppositions now due: April 3, 2020

Replies originally due: April 17, 2020

Replies now due: May 1, 2020.

However, this quarantine has been much more difficult than I had anticipated. Specifically, my soon to be two (2) year old and my seven (7) year old do not yet understand the distinction between a home office and a playground. I constantly need to rummage through boxes to access files that would normally be at my fingertips in the office, and some of these boxes are now located in my garage. I've had to adjust my work schedule to work nocturnally, primarily between 9:00PM – 5:00AM.

I've spoken with the other attorneys and we collectively, respectfully request the following new dates:

Oppositions originally due: April 3, 2020

Oppositions now due: April 17, 2020

Replies originally due: May 1, 2020

Replies now due: May 15, 2020.

Respectfully,

/s/ Marcel Florestal

cc: All counsel via ECF.